



DeSoto National Wildlife Refuge  
Final Comprehensive Conservation Plan  
Appendix K – Comments on Draft CCP/EA

OCT-18-00 WED 09:58 AM

FAX NO.

P. 01



October 12, 2000

U.S. Fish and Wildlife Service  
Southern Missouri Ascertainment Office  
24385 State Highway 51  
Puxico, Missouri 63960

Dear Mr. Salyer and Mrs. McClendon,

CC: William F. Hartwig, FWS Regional Director

Defenders of Wildlife is a national non-profit, public-interest organization with approximately 420,000 members and supporters, 5,000 of whom reside in Iowa and Nebraska. Defenders believes that all wildlife has intrinsic value, and that the conservation of all native species should be the primary goal of wildlife conservation programs. Defenders works to preserve the integrity and diversity of natural ecosystems, prevent the decline of native species, and restore threatened habitats and wildlife populations. Defenders has been a long time advocate for the Refuge System and appreciates the opportunity to comment on the draft Comprehensive Conservation Plan (CCP) for the DeSoto National Wildlife Refuge. Although this letter of comment arrives to you past the comment deadline, we hope you will consider our recommendations in drafting the final CCP.

Defenders supports many of the recommendations outlined in the Service's Alternative D. The question of rejoining DeSoto Lake with the Missouri River is indeed complicated and would have profound impacts on the refuge environment and the species that depend on it. This needs much more study and we are encouraged that Alternative D includes a preliminary study of the feasibility, implications, and impacts of the reconnection option. This issue is even more pronounced given the context of the Missouri Valley Improvement Act (S. 2704) which is still pending passage in Congress. This bill would result in sweeping changes to the management and restoration of the Missouri River, including dechannelization, restoration of flow patterns, and acquisition of new national wildlife refuge lands. The bill also includes a study to determine the details of restoration activities. The Service must be intimately involved in this effort, and encourage inclusion of DeSoto NWR in any restoration study and plan. In the absence of river-wide restoration, the refuge must be committed to completing its own study of reconnecting DeSoto Lake to the Missouri River and specify a time-frame for its completion.

POTENTIAL FORM 95 (7-00)

**FAX TRANSMITTAL**

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From: *Belinda*

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We support the refuge's expanded emphasis on a broader range of biodiversity than in the past, the decrease in croplands and the limits on boating times and seasonal usage of the refuge and the lake to preserve the shoreline soils, plants, and wildlife that reside or migrate to the lake.

We do have serious concerns, however. DeSoto lake under current and proposed management is essentially a huge fish tank for anglers, complete with an aerator. The Fish and Wildlife Service and DeSoto NWR are dedicated to the conservation of *all* native fish, wildlife, and plants. Artificially stocking certain species populations to the detriment of others for the benefit of recreation is not appropriate for a national wildlife refuge. Not only is this activity ecologically harmful, but it seriously detracts from the mission of the refuge and the refuge system by giving the public the impression that they cannot overfish an area because the government will always be there to restock. In this way stocking fish instills a poor conservation ethic and emphasizes to the public that game species are more valuable than non-game species, when in fact, the Service values all species ecologically functioning together. In addition to stocking game fish, the Service is removing 20,000 pounds native non-game fish to reduce competition with sport fish. Defenders is not against sustainable sport fishing on refuges when it is compatible with resource protection. Specifically developing a sport fishery, instead of protecting and restoring native aquatic communities, however, is not in-line with Congressional mandates and Service policy. Defenders believes these activities are both inappropriate and incompatible with the refuge and violate the 1997 National Wildlife Refuge System Improvement Act's (NWRSIA) mandate to "ensure that the biological integrity, diversity, and environmental health of the System are maintained for the benefit of present and future generations of Americans" (16 USC §668dd). Fisheries management should be incorporated into the "Wildlife Population and Habitat Management" section of the CCP and removed from the "Public Education and Recreation" section and should be expanded to address the entire native aquatic community.

The second concern we have is in regards to the agricultural runoff the refuge receives from surrounding properties. Instead of "band-aid" solutions like an artificial aeration system to combat eutrofication, the refuge should address the root causes of the problem. Water quality is one of the most important issues for an aquatic-centered refuge. The Service has to do more to use collaborative, incentive-based, and regulatory means to achieve better water quality. The NWRSIA directs the Service to identify "significant problems that may adversely affect the populations and habitats of fish, wildlife, and plants within the planning unit and the actions necessary to correct or mitigate such problems." This includes addressing problems that originate off-refuge. The CCP must contain detailed plans to curb the agricultural chemicals, nutrients, and sediment currently entering the lake.

The endangered species management component of the CCP needs to be expanded. Specifically, the draft plan states that piping plovers and least terns used to nest on the refuge in the 1970's, but since that time, encroaching vegetation in tern and plover habitat has crowded them out. Why has the FWS not removed vegetation to provide habitat for these species which have declined throughout their range? The Service has an obligation under Section 7 of the Endangered Species Act to carry out programs for the conservation of endangered species.



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Plovers and terns historically used shifting sand bars in the Missouri and other rivers to nest. These sand bars were relatively free of vegetation and were surrounded by water, offering protection from predators. With the channelization of many of our rivers, these sand bars have dramatically decreased. The Service should consider restoring and maintaining appropriate tern and plover habitat, including the construction of predator exclosures when necessary, to recover these species.

The fourth concern we have is the acquisition of the Wilson's Island State Park. While we normally support refuge acquisitions, the land proposed is already protected by the state. What is the reason for the National Wildlife refuge to acquire this public land? Will the land be converted to woodland or grassland or kept in its current state? The CCP should justify why the refuge would like to acquire additional lands and should be strategic about which lands would be best to use scarce conservation dollars.

Fifth, we are concerned with the collection of fruits, nuts, mushrooms, and fire wood by visitors. Fruits, nuts, and mushrooms are important food sources for wildlife and downed wood provides micro-habitats for small species and retains nutrients in the ecosystem. This activity also gives the public the impression that refuge resources are for people. Yes, ultimately, the protection of wildlife and habitat is for the benefit of the American people, but refuges are some of the last areas in the country where wildlife can find food, shelter, and avoid disturbance from people. Refuges are where "wildlife comes first", and the Service should encourage the public to "tread lightly" at DeSoto NWR.

Finally, the Service should take seriously the threat of an accident introduction of zebra mussels and other invasive species and take proactive measures to prevent future invasions. The Great Lakes and other areas infested with zebra mussels are not far from DeSoto NWR. There is a very real possibility of boaters carrying zebra mussels from those areas to DeSoto Lake. The Service needs to ensure that boats entering the refuge are not a threat to invasives introductions.

Again we appreciate the opportunity to help shape the direction of DeSoto NWR. The preferred Alternative has many positive steps to strengthen and improve refuge management to protect wildlife. We hope you take advantage of the CCP process and chart a bold course for resource protection at DeSoto NWR that protects all native fish, wildlife, and plants.

Sincerely,

Noah Matson  
Refuge Program Manager